# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
v.	) Criminal No. 1:21-cr-10256-RWZ
KINGSLEY R. CHIN,	)
ADITYA HUMAD, and	)
SPINEFRONTIER, INC.,	)
	)
Defendants	)

# **JOINT INTERIM STATUS REPORT**

Pursuant to Local Rule 116.5(b), the parties hereby file the following joint interim status report prepared in connection with the interim status conference scheduled for January 20, 2022.

#### 1) <u>Automatic Discovery</u>

The Government provided automatic discovery to the defendants on October 29, 2021 and has made supplemental discovery productions on December 10, 2021 and January 10, 2022.

#### 2) <u>Additional Discovery</u>

The Government anticipates providing supplemental discovery to defendants. The Government also anticipates receiving further productions of documents in this case and anticipates it will provide additional discovery to the defendants when it receives these productions.

#### 3) Timing of Additional Discovery Requests

The defendants have not submitted any discovery requests to the Government to date. The defendants are reviewing discovery and, at this time, reserve the need for further discovery requests.

#### 4) <u>Protective Orders</u>

The Court has entered a protective order in this matter. See Dkt. No. 37.

#### 5) Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b). They reserve the right to file such a motion or motions after additional review of the discovery.

## 6) Expert Discovery

The parties agree that deadlines for expert disclosures should be established at a later conference.

#### 7) <u>Defenses of Insanity, Public Authority, or Alibi</u>

Neither defendants presently intends to assert a defense of insanity, public authority, or alibi.

#### 8) Speedy Trial Act

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through January 20, 2022.

The parties request that the time be excluded from January 20, 2022 until the next status conference in this matter.

## 9) Status of Plea Discussions and Likelihood of Trial

The parties have not discussed a plea disposition. The parties estimate that a trial in this matter would last three to five weeks.

#### 10) Next Status Conference

Given the foregoing information, the parties request that the interim status conference, scheduled for January 20, 2022, be canceled. The parties request that an interim status conference be scheduled in approximately 60 days.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorneys,

/s/ William D. Weinreb

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ADITYA HUMAD

By his attorney,

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SPINEFRONTIER, INC.

By its attorneys

/s/ William D. Weinreb

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Dated: January 17, 2022

UNITED STATES OF AMERICA,

By its attorney,

RACHAEL S. ROLLINS United States Attorney

/s/ Chris Looney

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# **CERTIFICATE OF SERVICE**

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: January 17, 2022